Governance Document Type	☐ New Policy ☒ Revision ☐ Modification ☐ Procedure
Policy/Procedure Number	01.1.01
Policy/Procedure Category	Governance
Policy/Procedure Sub-Category	Policy Governance
Effective Dates	September 29, 2021 - Present

Policy Development and Approval Policy

Institutional Policy Type & Status

Administrative (relates to structure, infrastructure, operational/functional actions; may apply broadly)

Policy Established on	July 31, 2015 (Version 1)
Status, Date of Last Update	Current, as of September 29, 2021 (V2)
Next Scheduled Review Date	September 1, 2023

I. Rationale

A. **Governance Objectives** - This policy establishes requirements for 1) developing, reviewing, approving, and maintaining new Baylor College of Medicine (BCM) policies; 2) publicizing and socializing existing BCM policies among members of the BCM community; 3) documenting schedules for periodic policy review and update, and notice to affected stakeholders on new and existing BCM policies; 4) describing entities responsible for regular examination or approval of Baylor policies; and 5) describing entities responsible for implementation and administration of policy content. Procedures for Institutional Policy Approval (01.1.02) establish standard procedures for policy approval, including specialized pathways for academic, clinical, or administrative units as appropriate.

B. **Faculty Role in Governance** - This policy distinguishes the policy-making functions of the Board of Trustees from the responsibilities of the faculty and executive staff, and chief administrative officers to participate in policy development as well as administer and implement policy. This distinction demonstrates the College's commitment to ongoing faculty engagement in governance of both academic and administrative policy matters and ensures faculty exert a strong, consistent voice in institutional governance matters and take an active, meaningful role in policy administration. The collaboration between the Board of Trustees, administration, and faculty emphasizes Baylor's engagement in ongoing, integrated and institution-wide research-based planning and evaluation processes, utilizing key personnel across the institution to evaluate mission impact and alignment of proposed policies in the interest of achieving maximum institutional effectiveness.

C. **Unauthorized Policy Development or Implementation** - Lastly, this policy also provides notice to all stakeholders that institution-level policies developed and promulgated without adhering to the parameters and processes described in this document are not eligible for consideration by the Board of Trustees. Rogue institutional policies cannot take effect due to significant and unreasonable risks posed to the accuracy of content and reliability of due diligence measures undertaken prior to review and approval.

II. Stakeholders Affected by this Policy

Compliance with this policy is mandatory for any individual on the BCM main campus, off-campus instructional site, or branch campus that sponsors, authors, edits, or otherwise participates in the development or revision of a College policy including learners, faculty, staff, and school or institutional committee members.

III. Definitions

(a) **Academic Policy** – pertains to academic administration, instructional requirements, expectations for professionalism in the learning environment, learner rights and responsibilities, faculty rights and responsibilities and other teaching or learning activities at various levels. Academic policies are reviewed and approved through the procedures described in this policy.
   1. Academic Affairs Policy – is broad in scope and impacts activities at two or more schools at BCM.
   2. Faculty Affairs Policy – applies broadly to the faculty at-large, regardless of a faculty member's associated department(s), academic program(s), and participation in or focus on BCM mission achievement with respect to the clinical sciences, basic sciences, or education.
   3. School Policy – is narrow in scope and its impact is limited to degree-programs and/or certification programs housed and operated within a specific BCM school, and apply to associated faculty, staff, and/or learner populations therein.

(b) **Administrative Policy** – establishes non-academic operational rules or general standards of conduct, and promotes organizational efficiencies or compliance with applicable laws, regulations, or accreditation standards. An Administrative Policy may apply broadly to all members of the BCM community, or be restricted in scope such as to the operations of an individual unit or department (i.e. clinical services), or to identified stakeholders such as staff in specific operational roles (i.e. supervisors).

(c) **Authoritative Policy** – an Institutional Policy that is 1) formally approved by the Board of Trustees, and 2) published in the Policies & Procedures Manual on the BCM intranet website, or 3) made accessible on the website of the primary responsible office and/or appropriate school (e.g., handbook).

(d) **BCM** – Baylor College of Medicine.

(e) **Institutional Policy** – a writing intended to apply broadly that guides the actions of Baylor employees and/or learners working and learning at the College, supports achievement of the College's education, research, or clinical mission, and/or facilitates compliance with applicable state or federal laws, regulations, and accreditation standards. Academic and Administrative Policies are the two major categories of Baylor Institutional Policies.

(f) **Institutional Procedure** - describes how an academic or administrative unit will implement an Institutional Policy and/or instructs affected stakeholders how to implement Institutional Policy directives.

(g) **Mission Leader** – a Mission Leader oversees the development of their administrative or academic unit's Institutional policies and procedures. A Mission Leader may be a member of senior executive leadership (or their designee).

(h) **Obsolete Policy** – a policy that the Mission Leader determines to be inaccurate, ineffective, and/or places BCM at imminent risk for noncompliance with applicable laws, regulations, or standards.

(i) **Policy Governance Officer** – administrator that provides document support to Policy Sponsors and serves as the administrator for the Institutional Policy Committee.

(j) **Policy Sponsor** – a BCM employee, committee, or their designee (e.g., workgroup) with subject-matter expertise that is tasked with developing a new policy proposal or initiating updates to existing an Institutional Policy related to their expertise and authority.

(k) **Responsible Office** – offices, departments, or divisions charged with monitoring stakeholder compliance, policy implementation, and/or maintenance of a policy and/or related procedures.

(l) **Rogue Policy** – a policy that is created after the original effective date of this policy (July 31, 2015) and developed and/or disseminated without the approval of the Board of Trustees or

adhering to other the Institutional Policy development or approval requirements described in this policy.

(m) **Substantive Change** – a significant modification to the content or scope of a policy document.

(n) **Stakeholders** – individuals, or groups of individuals in similar positions or categories, that are affected by or must comply with an Institutional Policy and/or its related Procedures.

IV. Policy on Institutional Policy Development and Approval

A. **Governance Principles**. This policy establishes a framework to ensure that BCM Institutional Policies are not only readily accessible to the BCM community, but also well-developed, comprehensible, supportive of the BCM mission, contain clear guidelines for Stakeholder compliance, and achieve accountability by identifying responsible persons and/or offices tasked with implantation or supervision. All BCM Institutional Policies shall be:

1. Presented in a common format utilizing the current Institutional Policy Template,
2. Linked to Procedures for implementing the policy where appropriate,
3. Formally approved through the processes described herein,
4. Maintained in a central location that is electronically accessible to Stakeholders, i.e., the BCM Policies & Procedures Manual, and
5. Kept current within a schedule for periodic review and update.

B. **Scope**.

1. Institutional Policies. This policy applies to all BCM Institutional Policies developed and approved after the original effective date of this policy (July 31, 2015), and establishes rules of policy creation, revision, approval, management and training essential for effective policy governance of BCM's constituent schools, faculty, staff and students.
2. Exclusions: Department policies, guidelines, and protocols. Some departments, divisions, and centers may be authorized by an appropriate Mission Leader to independently propose, refine, update and "self-approve" Procedures, guidelines, or protocols to guide customary internal management functions with very narrow, specific and limited applications within the department, division, or center itself. Policies applicable only to the internal operations of a department, division, or center shall not conflict with any Authoritative Institutional Policies, but they may be more restrictive. Approval of governing documents with such limited application shall occur pursuant to existing department, division, or center policy or procedure for development and approval of the same, provided that the documents are consistent with relevant BCM Institutional Policies promulgated according to this policy.

C. **Institutional Policy Committee**. The Institutional Policy Committee (IPC) is a BCM institutional committee appointed by the President and Executive Dean to provide preliminary review and endorsement of all governance documents solemnizing Institutional Policy and serve as the primary gatekeeper to the policy governance process. The IPC provides input to the Office of the General Counsel regarding a document's fitness to enter Phase 2 of the policy governance process.

1. Comprised primarily of at-large BCM faculty, the Institutional Policy Committee is a deliberative body authorized to evaluate the sufficiency of proposed Institutional Policy content and Procedures from the faculty perspective, which may include, but is not limited to, consideration of the following policy governance issues: anticipated challenges to implementation; practical effects (short and long-term) of proposed policy changes on faculty, staff, and/or learners; availability of administrative support or other resources to facilitate or aid Stakeholder compliance; and/or operational changes that may be necessitated by or are a consequence of policy management, such as at the level of an academic program, department, center, or affiliated entity cooperation.
2. The IPC ensures that the Board of Trustees and senior leadership consistently incorporate the voices of at-large faculty, staff, and learners in policy governance. The

IPC is always active during Phase 1 of the Governance Process unless otherwise specified (refer to 01.1.02, Section VI.B).

3. As gatekeepers, members of the IPC control the policy development process and are ultimately responsible for the advancement of policies, forwarding only those policies that meet gatekeeper-defined standards to the next phase of the governance process.

4. In accordance with the requirements of the [Establishment and Operation of Institutional and School Committees Policy (01.2.01)](#), the IPC is authorized to fulfill these Institutional Policy duties as described in the Institutional Policy Committee Charge, which also describes membership terms.

D. **Policy Governance Process: Procedure for Institutional Policy Approval**. There are four consecutive phases of the standard procedure for Institutional Policy Approval: 1) Development, 2) Formal Review, 3) Approval and 4) Education and Management. Refer to Section VI.A of Procedures for Institutional Policy Approval (01.1.02). Roles and responsibilities of seminal actors vary by phase and policy type.

E. **Institutional Policy Development: Sponsors Initiate Changes**. Policy Sponsors must identify and communicate with College offices and departments that may be affected by or overlap with proposed Institutional Policy changes to ensure draft completion. Policy Sponsors may include: Mission Leaders, provided that their policy activities are consistent with their assigned missions and responsibilities established in the Faculty Bylaws or other relevant institutional documents; Chief Administrative Officers of Schools (or their designees), provided that the scope of their School Policy activities are consistent with the Faculty Bylaws; Senior Administrative Officers, provided that the scope of their policy activities are limited to their administrative unit and endorsed by impacted Mission Leaders; Institutional Committees, provided their policy activities are consistent with their decanal mandate or applicable Institutional Policy mandates and charges as provided in the [Establishment and Operation of Institutional and School Committees Policy (see 01.2.01, Section IV.A)](#); School Committees, provided that the scope of their School Policy activities are consistent with their charges ([see 01.2.01, Section IV.E](#)).

F. **Requirements for Formal Review of Institutional Policy**.
1. <u>Version Control</u>. While every effort will be made to produce a complete and accurate draft during Development (Phase 1), due to the complex trajectory of the policy governance process, editing may occur during later phases, resulting in multiple document versions. This policy requires each party engaged in the Institutional Policy Approval Procedure to review the same version of a given policy. Thus, whenever a policy draft approved by a body subsequently undergoes a Substantive Change, it becomes an alternate "version" of the former draft and the previous reviewer must be briefed on the changes. Non-substantive policy modifications made during Phase 2 or 3 do not result in the creation of an alternate policy version, and therefore shall not be resubmitted to the Institutional Policy Committee, whose endorsement remains valid.

2. <u>Review and Endorsement by the Institutional Policy Committee</u>. In order to maximize the institutional value of policies approved and promulgated under this policy, the Office of the General Counsel relies on the Institutional Policy Committee (IPC) to review and recommend refinement of new and revised Institutional Policies.

3. <u>Review and Endorsement by the Mission Leader(s)</u>.
   a. Mission Leaders are necessary participants in the policy approval process in the interests of mission achievement, establishing consistency with other Institutional Policies and applicable laws, and establishing communication and coordination among at-large faculty and College administrators to support unit Policy awareness.
   b. Mission Leaders must offer their endorsement of their unit's proposed Institutional Policies. Policies are clearly distinguishable by category, and based on the policy's content/category an appropriate Mission Leader (or Leaders) will be identified for endorsement purposes. Mission Leader endorsement signifies a proposed Institutional Policy is ready for approval.

G. **Requirements for Institutional Policy Approval**. Approval of Institutional Policies pertaining broadly to the education, research, or clinical sciences missions of the College, accreditation, and legal compliance can only be obtained from the Board of Trustees.

H. **Expectations for Stakeholder Compliance**. Compliance with this policy is mandatory for all BCM employees, groups, or committees on the BCM main campus, off-campus instructional sites, or branch campuses participating in the authorship, update, approval or distribution of a new or revised Institutional Policy.

I. **Noncompliance: Rogue Policies**. Rogue Policies are null and void.
   1. Rogue Policies are not eligible for endorsement by a Mission Leader, and cannot take effect due to significant and unreasonable risks posed to both the accuracy of content and reliability of due diligence measures undertaken prior to review and approval.
   2. Rogue Policies do not require stakeholder compliance, and shall be removed from any and all websites, handbooks and other stakeholder communication vessels upon discovery.
   3. Rogue Policies will be identified and removed at the request of the Office of the General Counsel, with notice of removal sent to the department or Mission Leader that created or implemented the Rogue Policy.

J. **Obsolete Institutional Policies**. Obsolete Policies may be archived by the Policy Governance Officer at the request of a Mission Leader (or designee), who must provide a written justification for the request.

K. **Substantive Changes**. Substantive Changes to Institutional Policies only require the endorsement of the IPC to take immediate effect, but changes must be reported to the Board of Trustees for subsequent approval.
   1. Examples of Substantive Changes to a policy might include the addition of considerable stakeholder fees (where no fee was included in a prior draft); expansion of the class or number of stakeholders whose compliance is mandatory; alterations to procedure, if included in the policy itself; addition of responsible offices and/or associated duties; heightened accountability for Responsible Office(s) and/or noncompliant Stakeholders.
   2. Approval of Substantive Changes to this Policy. Substantive Changes to Institutional Policies must be endorsed by the Mission Leader or their designee.
      a. Substantive Changes to this Policy rest with the Mission Leader for Institutional Policy Governance, the Senior Vice President & General Counsel, but also require the consent of the IPC Chairs.
      b. In accordance with the Establishment and Operation of Institutional and School Committees Policy (see 01.2.01, Section IV.A), comprehensive revisions of IPC Charter require the advice and endorsement of the IPC and the approval of the President and Executive Dean.

V. Responsibilities

A. The **Policy Governance Officer** is responsible for supports Institutional Policy development, approval, and awareness. The Policy Governance Officer's responsibilities include:
   1. Categorizing and Tracking Policies for Approval – serving as a facilitator and ex officio member of the IPC, a steward that tracks policy development and approval and that reports to the Senior VP & General Counsel, and categorizes proposed policies to ensure Mission Leader identification and assignment.
   2. Indexing and Numbering Policies and Procedures – includes determining and labeling the correct numerical code for new and existing Authoritative Policies and Procedures, as well as publishing and indexing these documents on the policy governance intranet website, the BCM Policies & Procedures Manual, according to a three-part numerical

code. The code's first part identifies the major organizational area covered, the second part identifies the sub-division or department within the major organizational area, and the last part identifies the specific policy within the sub-division.

3. Adding Policy Drafts to the IPC's Meeting Agenda - The Policy Governance Officer will review and place completed policy drafts on the Institutional Policy Committee agenda for discussion.

4. Completing Policy Review & Update – includes reviewing this policy as well as the Institutional Policy Committee Charter every two years, and ensuring the policy and Charter are updated as necessary to comply with changes in Institutional Policy Governance priorities or requirements, as identified by senior leadership, but at least every five years.

5. Serving as a Resource for Policy Sponsors, Stakeholders, Responsible Offices and Executive Leadership.

6. Consult the **Institutional Policy Committee Charter** for more detailed information on the Committee's policy governance responsibilities and mechanisms for action.

B. The **Office of the President** is responsible for ensuring Institutional Policy Committee's formation and continued operation are in accordance with the Establishment and Operation of Institutional and School Committees Policy (see 01.2.01), as documented in the IPC's Charter.

VI. Procedures for Institutional Policy Approval

Refer to Procedures for Institutional Policy Approval (01.1.02).

VII. Stakeholder Compliance

Rogue Policies will be removed as provided above.

VIII. Tools

- IPC Charter;
- Policy Development and Approval Standard Procedures (Diagram);

IX. Related Policies

- 01.1.02 – Procedures for Institutional Policy Approval;
- 01.2.01 – Establishment and Operation of Institutional and School Committees Policy;
- 30.1.01 – Substantive Change Policy (addresses substantive changes to academic programs, which are not governed by 01.1.01)
- 30.1.02 – Academic Program Approval Policy (addresses approval of new academic programs, which is not governed by 01.1.01)

X. Applicable Laws, Regulations & Standards

- **Southern Association of Colleges and Schools Commission on Colleges** (SACSCOC):
  - Principles of Accreditation (2018); See Section 10 (Educational policies, procedures, and practices);
  - Resource Manual for the Principles of Accreditation (2018); See Standards 10.1 (academic policies), 10.4 (academic governance);